REMARKS

The last Office Action is the above-identified application and the references cited by the Examiner have been carefully considered. The claims have been amended in a sincere effort to define more clearly and more specifically features of Applicants' invention which distinguish over the art of record.

The Examiner has rejected Claims 1-8 and 10-19, which are pending in the application, under 35 U.S.C. §103(a) as being unpatentable over European Patent Application No. EP 0 936 530 A1 (Benson) in view an article by Gabrielle C. Mitchell, entitled "USB Forum Produces Logo, Awareness Initiatives", published in the Computer Retail Week on November 24, 1997. These are the same references which were cited in the Examiner's previous Office Action mailed March 24, 2004, in which dependent Claims 4, 10 and 16 were only objected to and were found to contain allowable subject matter. Dependent Claims 4, 10 and 16 were allowed "because, Benson does not discloses a bootup module for responding if a smartcard reader is coupled to the host processor. Benson discloses that if a dongle is coupled to the computer the smartcard program boots." (Please see Paragraph 14 of the Examiner's previous Office Action mailed March 24, 2004).

With respect to Claims 4, 10 and 16, it is respectfully urged that these claims define structure and steps which are not taught or suggested by either the Benson patent application or the Gabrielle C. Mitchell article, as the Examiner found in her previous Office Action. No bootup module for responding if a smartcard reader is coupled to a host processor is disclosed in either of the references applied against the claims. Applicants have carefully reviewed the Benson patent application and the Gabrielle C. Mitchell article, and respectfully submit that they have found no disclosure of such a bootup module in either reference. The Examiner refers to Column 6, lines 38-44 of the Benson patent application with respect to her rejection of Claims 4 and 10, and Column 6, lines 38-44 and Column 24, lines 42-47 of the Benson patent application with respect to Claim 16, but it does not appear that a bootup module for responding if a smartcard reader is coupled to a host processor is disclosed at these passages.

To gain the allowance of dependent Claims 4, 10 and 16, these claims have now been rewritten in independent form to incorporate the limitations of any base or intervening claims

from which they depend. It is respectfully urged that Claims 4, 10 and 16, as now amended, patentably distinguish over the references of record and are allowable. If the Examiner has any questions or comments concerning these particular claims, it is respectfully requested that she contact the undersigned attorney at the telephone number given below.

The rejection of the remaining claims, that is, Claims 1-3, 5-8 (Claim 9 has been cancelled), 11-15 and 17-19 in view of the Benson patent application and the Gabrielle C. Mitchell article is respectively traversed. With respect to Claim 1, in particular, it is respectfully urged that these references do not teach or suggest a smartcard processor. Rather, they disclose a Virtual Smart Card (VSC), which is essentially a smartcard emulator. More specifically, the Benson patent application discloses a virtual smartcard, i.e., software, running on a general purpose processor that emulates the behavior of a smartcard. The invention defined by rejected Claim 1 and its dependent claims rejected employs a smartcard processor, not a smartcard emulator. The smartcard processor is an integrated circuit, and not software or an emulator. Such a hardware smartcard processor, as defined by the pending claims, is not found in any of the references cited by the Examiner.

Rejected Claim 1 and its dependent claims also define the token as including an interface processor and a translation module, which interprets USB-compliant messages into smartcard processor-compliant messages and interprets smartcard-compliant messages into USB-compliant messages. Neither the Benson patent application nor the Gabrielle C. Mitchell article teaches or suggests such an interface processor implementing a translation module for interpreting USB-compliant messages into smartcard processor-compliant messages and for interpreting smartcard processor-compliant messages into USB-compliant messages. Neither reference discloses this structure. The Examiner cites Column 4, lines 4-23 and Column 24, lines 8-16 of the Benson patent application, but the operational steps set forth in these passages do not even mention an interface processor.

With respect to Claim 8, which was rejected in view of the Benson patent application, it is respectfully urged that the Benson patent application does not teach or suggest a virtual smartcard reader having a communication module packaging smartcard compliant commands to a personal token. The "dongle" is used only to authorize the execution of the virtual smart card (VSC) program. Additionally, the smartcard commands are not sent to either the VSC

server or the dongle. The VSC server and the dongle only act as the data repositories where protected data is stored and retrieved, but no translation or packaging of smartcard commands or responses are performed in the VSC server or the dongle.

With respect to Claim 14, it is respectfully urged that neither the Benson patent application nor the Gabrielle C. Mitchell article teaches or suggests a communication module for packaging messages for transmission to a personal token via a USB-compliant interface according to a first protocol and for unpackaging messages received from the personal token via the USB-compliant interface according to the first protocol, nor do these references disclose an interface processor translation module that unpackages messages from the host processing device according to the first protocol and packages messages destined for the host processing device according to the first protocol. The passages of the Benson patent application cited in the Office Action, that is, Column 6, lines 38-45, 56-58; Column 7, lines 1-5; Column 4, lines 4-23; Column 24, lines 8-16; Column 4, lines 14-23; Column 6, lines 39-44; Column 6, lines 38-41; and Column 24, lines 8-16, were carefully reviewed by Applicants, and none of these passages discloses the particular structure and corresponding function set forth in Claim 14.

With respect to Claim 19, which similarly was rejected in view of the Benson patent application, there is nothing in the Benson patent application which teaches or suggests a smartcard reader emulator in a personal key for emulating smartcard reader operations to a smartcard-compliant personal key processor. The passages cited, that is, Column 3, lines 29-35; Column 4, lines 14-23; and Column 24, lines 8-16, of the Benson patent application do not teach or suggest a first smartcard reader emulator implemented in a host computer for emulating smartcard reader operations to the host computer, and a second smartcard reader emulator implemented in a personal key for emulating smartcard reader operations to a smartcard-interface compliant personal key processor. This structure is simply not set forth anywhere in either the Benson patent application nor the Gabrielle C. Mitchell article.
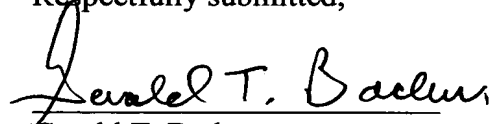
Accordingly, it is respectfully urged that independent Claims 1, 8, 14 and 19 as well as new independent Claims 4, 10 and 16, as well as dependent Claims 2, 3, 5-7, 11-13, 15, 17 and 18, patentably distinguish over the references of record and are allowable for the reasons

set forth above. It should be noted that a minor amendment was made to Claim 3 to correct a

typographical error.

In view of the foregoing amendments and remarks, entry of the amendments to Claims

4, 10 and 16, which were previously found to be allowable, reconsideration of Claims 1-8 and

10-19 and allowance of the application with Claims 1-8 and 10-19 are respectfully solicited.

Respectfully submitted,

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